

# **EXHIBIT H**

## Justina K. Sessions

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**From:** Justina K. Sessions  
**Sent:** Monday, October 10, 2016 9:14 AM  
**To:** 'Trager, Lara'  
**Cc:** 'ronnie@hbsslaw.com'; 'swilliams@cpmlegal.com'; Demetrius Lambrinos; 'evelyn@cuneolaw.com'; Hemlock, Adam; Novison, Heather; 'Vicky@cuneolaw.com'; mlundburg@dbcllp.com  
**Subject:** RE: Auto Parts - Honda

Lara,  
I am available to meet and confer on Thursday any time other than 11-1 Pacific.

Regards,  
Justina

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**From:** Trager, Lara [<mailto:Lara.Trager@weil.com>]  
**Sent:** Friday, October 07, 2016 4:23 PM  
**To:** Justina K. Sessions  
**Cc:** 'ronnie@hbsslaw.com'; 'swilliams@cpmlegal.com'; Demetrius Lambrinos; 'evelyn@cuneolaw.com'; Hemlock, Adam; Novison, Heather; 'Vicky@cuneolaw.com'; [mlundburg@dbcllp.com](mailto:mlundburg@dbcllp.com)  
**Subject:** Auto Parts - Honda

Dear Justina:

We are writing with respect to the serving parties' negotiations with Honda in the Auto Parts case. As you know, over the last several months the serving parties and Honda have been working on reaching an agreement on the scope of production in response to the serving parties' subpoenas. We appreciate your cooperation in this process, and we are optimistic about the progress that has been made. While Honda has offered to produce some categories of documents and data requested by the serving parties, there are still significant gaps in certain areas.

We would like to schedule a meet and confer call for next Thursday to recap where we stand and work toward finalizing our positions on open issues. Please let us know if you are available for a call next Thursday afternoon ET.

As you are aware however, Judge Battani ruled in June that the serving parties may take discovery-on-discovery depositions of certain OEM groups, including Honda. While the serving parties would like to avoid taking this deposition of Honda, at this juncture we do not have the information necessary to evaluate the adequacy of Honda's production offer. Judge Battani ordered the serving parties to move forward promptly with OEM discovery and it is crucial that we endeavor to keep Honda on the same or a similar track as the other OEM groups. In order to ensure that we will be able to do so, Defendants expect to serve, by COB Tuesday, a deposition subpoena. As we have yet to reach agreed-upon dates with you, we plan to include placeholder dates at or around the end of this month.

The serving parties are eager to continue negotiations with Honda in the interim, and plan to make every effort to avoid this deposition and a potential motion. We look forward to continuing our discussions and working toward a resolution.



L.E. Veblen Trager

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